

The Honorable Jamal N. Whitehead

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE VALVE ANTITRUST LITIGATION

Case No. 2:21-cv-00563-JNW

**DECLARATION OF CALEAH
WHITTEN IN SUPPORT OF
INTERESTED PARTY
HUMBLE BUNDLE, INC.'S
UNOPPOSED MOTION TO
SEAL DOCUMENTS**

I, Caleah Whitten, declare as follows:

1. I am an associate with Davis Wright Tremaine LLP. I represent interested party Humble Bundle, Inc. ("Humble") in connection with this matter. I submit this declaration in support of Humble's Unopposed Motion to Seal Documents ("Motion"). I have personal knowledge of the facts set forth in this declaration and I am competent to testify to them.

2. Both defendant Valve Corp. ("Valve") and Plaintiff Wolfire Games, LLC ("Wolfire") served Humble with third-party subpoenas to produce documents and information. Both subpoenas sought Humble's highly sensitive and confidential strategic information, such as Humble's market analyses, its assessment of its competitors, and its strategic planning. The subpoenas also sought financial information, including revenue earned and fees charged (essentially, prices charged to PC game developers and publishers) across products. Humble

WHITTEN DECLARATION ISO
INTERESTED PARTY HUMBLE BUNDLE'S
UNOPPOSED MOTION TO SEAL (2:21-cv-00563-JCC) - 1

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1 designated this data Highly Confidential – Attorneys’ Eyes Only pursuant to the Protective Order
 2 prior to producing it to Valve and Wolfire. No party has challenged Humble’s designation.

3 3. Several documents, filed provisionally under seal, attach or cite to Humble’s data.
 4 In particular, Humble’s highly sensitive strategic planning and financial data is reflected in:

- 5 a. Dkt. No. 449 (Valve Motion to Exclude Schwartz) at p. 9, line 5;
- 6 b. Dkt. No. 450 (Kilaru Declaration ISO Valve Motion to Exclude Schwartz),
 - 7 i. Ex. 2 (Attachment E-1), row “Humble Bundle,” columns “2017,”
 - 8 “2018,” “2019,” “2020,” “2021,” and “Total”;
 - 9 ii. Ex. 6 (HB_Valave001262), the entire document;
 - 10 iii. Ex. 13 (Schwartz Supplemental Attachment E-1), row “Humble
 - 11 Bundle,” columns “2017,” “2018,” “2019,” “2020,” “2021,” “2022,”
 - 12 “2023,” and “Total”;
- 13 c. Dkt. No. 452 (Kilaru Declaration ISO Valve Motion to Exclude Reitveld),
 - 14 i. Ex. 2 (Reitveld Response Merits Report) at ¶ 168, HB_Valve005381
 - 15 (the entire document, if attached to or included in Ex. 2);
 - 16 ii. Ex. 3 (Reitveld Opening Merits Report) at ¶¶ 37–48, 39, 44, p. 23 at
 - 17 Fig. 3, HB_Valve005381 (the entire document, if attached to or
 - 18 included in Ex. 3);
 - 19 iii. Ex. 5 (Reitveld Reply Merits Report) at ¶ 79;
- 20 d. Dkt. No. 454 (Kilaru Declaration ISO Valve Motion for Summary Judgment),
 - 21 i. Ex. 2 (Attachment E-1), row “Humble Bundle,” columns “2017,”
 - 22 “2018,” “2019,” “2020,” “2021,” and “Total”;
 - 23 ii. Ex. 5 (Reitveld Response Merits Report) at ¶ 168, HB_Valve005381
 - 24 (the entire document, if attached to or included in Ex. 5);
 - 25 iii. Ex. 8 (Schwartz Supplemental Merits Report), Schwartz Supplemental
 - 26 Attachment E-1 (row “Humble Bundle,” columns “2017,” “2018,”
 - 27

“2019,” “2020,” “2021,” “2022,” “2023,” and “Total”, if attached to
Ex. 8).

4. **Exhibit A** is a PDF of an Excel spreadsheet identifying the specific confidential information at each of the above citations that Humble proposes to seal. Because these documents were filed provisionally under seal, Humble has not been able to review the documents themselves. It is relying on representations from the parties regarding the location of the information at issue.

5. My colleagues also representing Humble conferred with counsel for all parties regarding this Motion. They conferred with counsel for Plaintiffs via email on August 4, 2025 and August 6, 2025. They conferred with counsel for Valve via email on July 31 and August 1, 2025. The parties do not oppose Humble’s Motion.

I certify under penalty of perjury that the foregoing is true and correct.

DATED this 7th day of August, 2025 in Seattle, Washington.

s/ Caleah N. Whitten
Caleah N. Whitten, WSBA No. 60209

EXHIBIT A

Dkt. No.	Document	Filed PDF Pg.	Doc Pg.	Pin Cite	Proposed Redactions	Source	Source Designation
449	Valve Motion to Exclude Schwartz	9-10	9	5	Dr. Schwartz further admits to not even considering available documentary evidence contradicting his approach. See, e.g., Ex. 6 (Schwartz Dep. Ex. 30), at 2 (Humble Bundle ordinary-course document describing [REDACTED])	HB_Valve001262	Highly Confidential
450.2	Kilaru Declaration ISO Valve Motion to Exclude Schwartz, Ex. 2 (Schwartz Attachment E-1)	[not provided]			Row "Humble Bundle," columns "2017," "2018," "2019," "2020," "2021," and "Total"	Humble revenue	Highly Confidential
450.6	Kilaru Declaration ISO Valve Motion to Exclude Schwartz, Ex. 6 (Exhibit 30 - S. Schwartz Merits Deposition)	n/a	n/a	n/a	ENTIRE DOCUMENT	HB_Valve001262	Highly Confidential
450.13	Kilaru Declaration ISO Valve Motion to Exclude Schwartz, Ex. 13 (Schwartz Supplemental Attachment E-1)	[not provided]			Row "Humble Bundle," columns "2017," "2018," "2019," "2020," "2021," "2022," "2023," and "Total"	Humble revenue	Highly Confidential
452.2	Kilaru Declaration ISO Valve Motion to Exclude Reitveld, Ex. 2 (Reitveld Response Merits Report)	90	86	¶ 168	As stated in an internal Humble Bundle "Platform Strategy Primer" presentation from 2020, "[REDACTED]."	HB_Valve005381	Highly Confidential
452.2	Kilaru Declaration ISO Valve Motion to Exclude Reitveld, Ex. 2 (Reitveld Response Merits Report)	[not provided]			HB_Valve005381, ENTIRE DOCUMENT, if attached	HB_Valve005381	Highly Confidential
452.3	Kilaru Declaration ISO Valve Motion to Exclude Reitveld, Ex. 3 (Reitveld Opening Merits Report)	[not provided]		¶¶ 37-48	As stated in an internal Humble Bundle presentation from March 2020, "[REDACTED]."	HB_Valve005381	Highly Confidential
452.3	Kilaru Declaration ISO Valve Motion to Exclude Reitveld, Ex. 3 (Reitveld Opening Merits Report)	26	23	¶ 39	Humble Bundle specifically acknowledged [REDACTED] in an internal Humble Bundle "Platform Strategy Primer" presentation from March 2020:	HB_Valve005381	Highly Confidential
452.3	Kilaru Declaration ISO Valve Motion to Exclude Reitveld, Ex. 3 (Reitveld Opening Merits Report)	26	23	Fig. 3	ENTIRE FIGURE	HB_Valve005381	Highly Confidential
452.3	Kilaru Declaration ISO Valve Motion to Exclude Reitveld, Ex. 3 (Reitveld Opening Merits Report)	29-30	26-27	¶ 44	As stated in the internal Humble Bundle "Platform Strategy Primer" presentation about [REDACTED]."	HB_Valve005381	Highly Confidential
452.5	Kilaru Declaration ISO Valve Motion to Exclude Reitveld, Ex. 5 (Reitveld Reply Merits Report)	49	46	¶ 79	As stated in an internal Humble Bundle presentation from March 2020, "[REDACTED]."	HB_Valve005381	Highly Confidential
452.5	Kilaru Declaration ISO Valve Motion to Exclude Reitveld, Ex. 2 (Reitveld Response Merits Report)	[not provided]			HB_Valve005381, ENTIRE DOCUMENT, if attached	HB_Valve005381	Highly Confidential

454.2 Kilaru Declaration ISO Valve Motion for Summary Judgment, Ex. 2 (Schwartz Attachment E-1)	[not provided]	n/a	n/a	ENTIRE DOCUMENT	Humble revenue	Highly Confidential
454.5 Kilaru Declaration ISO Valve Motion for Summary Judgment, Ex. 5 (Rietveld Response Merits Report)	90	86	¶ 168	As stated in an internal Humble Bundle “Platform Strategy Primer” presentation from 2020, “[REDACTED].”	HB_Valve005381	Highly Confidential
454.5 Kilaru Declaration ISO Valve Motion for Summary Judgment, Ex. 5 (Rietveld Response Merits Report)	[not provided]			HB_Valve005381, ENTIRE DOCUMENT , if attached	HB_Valve005381	Highly Confidential
454.8 Kilaru Declaration ISO Valve Motion for Summary Judgment, Ex. 8 (Schwartz Supplemental Merits Report)	[not provided]			Schwartz Supplemental Attachment E-1, row “ Humble Bundle ,” columns “ 2017 ,” “ 2018 ,” “ 2019 ,” “ 2020 ,” “ 2021 ,” “ 2022 ,” “ 2023 ,” and “ Total ”, if attached	Humble revenue	Highly Confidential